## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
v.	)	CRIMINAL NO. 11-cr-10286-DPW
CATHERINE GREIG, Defendant.	) ) )	
	)	

## UNITED STATES' STATUS REPORT AND ASSENTED-TO MOTION FOR PRETRIAL CONFERENCE PURSUANT TO LOCAL RULE 116.5(C)(2)

The United States hereby submits this status report and moves, pursuant to Local Rule 116.5(c)(2), for the scheduling of a pretrial conference before the District Court in this matter. As grounds for this motion, the United States says the following:

- 1. The District Court has already set a trial date in this matter for May 7, 2012.
- 2. The parties anticipate that any additional motions are properly brought before, and should be resolved by, the District Court.
- 3. The United States does not anticipate at this time producing substantially more discovery. The United States has been producing materials on a rolling basis and will continue to produce materials in accordance with its discovery obligations. For the past few months, the United States has been engaged in review of large quantities of documents and things for production. The United States has produced materials identified as discoverable from that review, but the review is ongoing. Based on its collection and review of materials to date, however, the United States expects that it will produce additional materials, but that the additional materials will be relatively small in quantity. So far, the parties have had no disputes over the scope of discovery, and do not anticipate any. To the extent disputes arise that the parties cannot resolve themselves, the parties will bring them to the attention of the District Court promptly for resolution in advance of the trial date.
- 4. No motions under Fed. R. Crim. P. 12(b) have been filed, nor are any expected.

5. For purposes of the Speedy Trial Act, this court has excluded the following dates:

August 11, 2011 through September 29, 2011 (the time following the defendant's arraignment on August 11, 2011 to the date of the initial status conference set for September 29, 2011) (see Dkt. 30); and

September 29, 2011 through November 29, 2011 (the dates between the initial status conference and the final status conference) (Dkt. 45).

Separately, the District Court has excluded the time from October 6, 2011 through May 7, 2012 (the date currently set for trial) (Dkt. 41). Currently pending is an assented to motion for excludable delay, which provides further reasons for excluding the time between November 29, 2011 and May 7, 2012 (Dkt. 56).

6. The parties anticipate 15 days of trial for this matter.

The United States has conferred with the Defendant regarding this motion and she assents. In light of this motion, the parties submit that the final status conference scheduled for February 16, 2012 is unnecessary.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Jack W. Pirozzolo
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## **CERTIFICATE OF SERVICE**

I, Jack W. Pirozzolo, hereby certify that on February 15, 2012, I served a copy of the foregoing motion via electronic filing on counsel for the defendant.

/s/ Jack W. Pirozzolo Jack W. Pirozzolo

## **CERTIFICATE OF CONFERENCE**

I, Jack W. Pirozzolo, hereby certify that on February 14, 2012, I conferred with counsel for the defendant regarding the subject matter of this motion and he assented to the motion.

/s/ Jack W. Pirozzolo
Jack W. Pirozzolo